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Department of Environmental Protection

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Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Virginia B. Wetherell
Secretary

June 27, 1995

Mr. Randy Bryant
South Superfund Remedial Branch
EPA Region IV
345 Courtland Street N. E.
Atlanta, Georgia 30365

SUBJECT: Chevron Chemical NPL Site
Orlando, Florida
Review Comments for Draft ROD and Proposed Plan

Dear Randy:

The Department has reviewed the above referenced documents received on April 3, 1995 and also the supplemental sampling data received June 7, 1995. As discussed in our conversation yesterday, the following comments do not include the entire FDEP staff review comments. I will forward the technical review and toxicology section comments within the next week.

PROPOSED PLAN

1. Summary of Site Risks on page 4 indicate that "According to the risk assessment, soil at the Site is safe for commercial use of the site." Table 6 in the ROD indicates that onsite Future Adult worker has a risk of 2×10^{-5} which is above FDEP guidelines of 1×10^{-6} . Based on the FDEP risk guidelines, the site is not safe for commercial use and further excavation may be necessary.
2. Table 3 should be changed to incorporate the new soil data from the April 1995 sampling event at the Armstrong Trailer Park. This data will provide a better general risk exposure level consistent with FDEP policy (1×10^{-6}) than the listed contaminant levels.
3. Table 4 on page 6 provides a list of COC, however the State MCL listing does not include the secondary standards and/or minimum criteria for groundwater. Previous FDEP comments have stressed the importance that all Florida primary and secondary standards and minimum criteria will apply. This will affect the following information:

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Groundwater Contaminant	Listed MCL(ug./l)	Proper MCL	
Ethylbenzene	700	30	Secondary Standard
Xylenes	10,000	20	Secondary Standard
2,4-Dimethylphenol	NA	400	Minimum Criteria
4,4'-DDD	NA	.1	
a-BHC	NA	.05	
b-BHC	NA	.1	

4. Groundwater Alternatives, page 7, under Alternative 1- indicate the estimated timeframe for breakdown of groundwater contaminants.

5. Alternative 2, page 7, should include deed restrictions for not only groundwater but also for zoning requirements. Information should also state why this site should be zoned commercial and not residential based on risk assessment information. Institutional controls should also be incorporated at the Armstrong Trailer Park for groundwater requirements due to groundwater contamination.

This alternative should include "triggers" that would include contingencies to account for possible attenuation failure. A statement should be included to indicate that alternatives for active remediation of groundwater would be reconsidered upon attenuation failure or plume migration. EPA in consultation with FDEP will review all data and provide an annual evaluation to determine if it is practical to continue sampling for natural attenuation or provide active remediation. Alternative #6 indicates use of a specific technology and does not offer other active technologies that may become necessary to control the plume. Alternative #6 should be removed and Alternative #2 should include several options including active remedial efforts rather than selecting only the bioactive filter option.

6. Alternative 6 has a lower estimated construction costs and yet includes alternative 4. [Construction of the Bioactive filter wall in Alternative 4 was estimated at \$1,053,100] Please explain this difference in cost.

7. Compliance with ARARs, page 8, should indicate the range of "reasonable timeframes." What are these timeframes?

8. Short-Term Effectiveness, page 8, second paragraph indicates that it will take 8-10 years for cleanup for Alternatives 3, 4, and 5. However there is no mention of the estimated timeframe for natural attenuation. [Reference to page 26 of the ROD provides a timeframe.] Comparison of both approaches should be included in the proposed fact sheet in order to incorporate a logical framework for presentation of important information.

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9. Page 9, 1st paragraph indicates an Alternative #8. The text does not include an Alternative with this #.

10. Under State Acceptance, page 9, is this a Preferred Alternative or "Suggested" Alternative? Please clarify the term "seasonal" sampling. Sampling should be conducted on a quarterly basis.

11. EPA's Preferred Alternative, page 9, does not indicate the timeframes for both pump and treat technology and natural attenuation. [See comment #3]

RECORD OF DECISION COMMENTS

1. Assessment of the Site, page 1, first paragraph, should include language relating to dermal exposure from **contaminated soil** as a additional unacceptable risk associated with the site.

2. Scope and Role of Action, page 10, indicates that the "planned actions for this Site address both soil and groundwater contamination." However, there is no action for remediation of soil under all of the cleanup alternatives. Please explain.

3. Page 17, Table 4, see comment #1 for proper information

4. Page 22, 2nd paragraph indicates that "Exposure to onsite soil under existing conditions and land use does not pose an unacceptable risk". See Comment #1 under Proposed Plan comments.

5. Page 22, 3rd paragraph indicates that "Future residential use of the site poses an unacceptable risk, primarily due to ingestion of contaminated groundwater." This statement is not true based on the data indicated in Table #6. Future Use, based on soil exposure, provides an unacceptable risk for many of the land use receptors. Please discuss. The word "contaminated soil" should be incorporated into the sentence.

6. Page 22, 4th paragraph indicates that "Current and future exposure to soil at the adjacent Armstrong Trailer Park does not pose an unacceptable risk." According to the data in Table 7, a child resident has a high level of risk associated with exposure to soil. [7×10^{-6}]. This level is inconsistent with FDEP policy of 1×10^{-6} . Please discuss.

7. Selected Remedy on page 31 indicates that "...the risk associated with this Site has been determined to be in the range from 1×10^{-5} to 1×10^{-6} ". This is an incorrect statement, especially for the existing soils on site for Adult worker.
[Note comment #3]

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8. Define the term "seasonal" monitoring as noted throughout the text under Groundwater Remediation, and Alternatives.

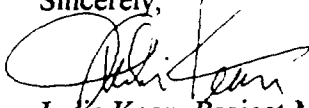
9. Page 33, 1st paragraph indicates that "....EPA may re-evaluate the remedy and consider other necessary actions." The underlined may should be substituted with "will". Please refer to Comment #3 under the Proposed Plan Comments for further discussion of the information that should be included in this Alternative.

10. Page 34, Compliance with ARARs, notes the use of Florida Administrative Codes as 17-. The code numbering system has been changed to 62-.

11. Page 30, Implementability, indicates Alternative #8. This alternative is not listed in the text.

If you have questions concerning this information, please contact me at 904-488-0190.

Sincerely,



Judie Kean, Project Manager
Hazardous Waste Cleanup Section